

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

SONIA IVETTE RAMOS GONZALEZ

DEBTOR

CASE NO. 18-06277/EAG

CHAPTER 13

**DEBTOR'S MOTION FOR EXTENSION OF TIME
TO REPLY TO TRUSTEE'S MOTION FOR COPY OF TAX RETURNS,
DOCKET NO. 26**

TO THE HONORABLE COURT:

NOW COMES, SONIA IVETTE RAMOS GONZALEZ, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December 19, 2022, the Chapter 13 Trustee filed a *Trustee's Motion for Copy of Tax Returns*, Docket No. 26, alleging that the Debtor has not provided a complete and legible copies of the returns for the years 2018, 2019, 2020 and 2021.

2. The Debtor hereby respectfully states that due to the Holiday Season the Debtor has been unable to meet with her undersigned attorney in order to adequately reply to the *Trustee's Motion for Copy of Tax Returns*, Docket No. 26.

3. The Debtor respectfully requests additional time of thirty (30) days within to meet with the undersigned attorney, provide for the tax returns and file a reply to the *Trustee's Motion for Copy Tax Returns*, Docket No. 26. This extension of time to expire on February 1, 2023.

WHEREFORE, based on the above stated, the Debtor respectfully prays that this Honorable Court grant the present motion requesting extension of time to reply to the *Trustee's Motion for Copy Of Tax Returns*, Docket No. 26, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtor to her address of record.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 2nd day of January, 2023.

/s/ Roberto Figueroa Carrasquillo
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